

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

Case No.
Hon.

v

ROBERT D. MANOR,

Defendant.

_____/

COMPLAINT

Plaintiff, the United States of America, by and through its undersigned counsel alleges as follows:

Nature Of Action

1. This is a civil action under Section 3001(a)(1) of the Federal Debt Collection Act to recover a debt due the United States.

Jurisdiction And Venue

2. This court has jurisdiction over the subject matter of this action pursuant to 28 U.S.C. §§ 1331 and 1345.

3. Venue is proper in this district pursuant to 28 U.S.C. § 1391(b) because the defendant resides in this district and the claim arose in this district.

Defendant

4. Robert D. Manor (“Manor”) is an individual person and a resident of the State of Michigan, whose last known address is 1200 Mill Creek Road, Flint, MI 48532.

The Debt – Account No. 2011A70892

5. On or about May 8, 2007 the defendant executed a promissory note to secure a Direct Consolidation loan from the United States Department of Education. A copy of the promissory note is attached hereto and marked as Exhibit A and incorporated herein as if fully set forth.

6. The debt owed to the United States of America is as follows:

A.	Current principal	\$130,452.33
B.	Current capitalized interest	\$ 66,403.13
C.	Accrued interest since December 15, 2014	\$ 3,545.64
	Total owed	\$200,401.10

The Certificate of Indebtedness is attached hereto and marked as Exhibit B. The principal balance and interest balance shown on the Certificate of Indebtedness is correct as of the date of the Certificate of Indebtedness after application of all prior payments, credits and offsets. Prejudgment interest continues to accrue at the rate of \$28.41 per day.

Failure to Pay

8. Demand has been made upon the defendant for payment of the indebtedness, and the defendant has neglected and refused to pay the same.

WHEREFORE, the United States respectfully requests that the Court enter judgment in its favor and against Robert D. Manor, in the amount of \$200,401.10 plus prejudgment interest through the date of judgment, and post-judgment interest at the rate set forth in 28 U.S.C. § 1961; and such other and further relief as is deemed just and reasonable.

BARBARA L. McQUADE
United States Attorney

By: s/JACQUELINE M. HOTZ
Assistant United States Attorney
211 W. Fort, Ste 2001
Detroit, MI 48226
Tel. No. 313-226-9108
Email: Jackie.Hotz@usdoj.gov
Mich Bar No. P35219

Dated: April 23, 2015